## REMARKS

Claims 1-19 are pending in the present application. Claims 4-6 and 14 have been amended herewith. Reconsideration of the claims is respectfully requested.

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

### I. Drawing Objection

The Examiner objected to the drawings, stating that reference numerals 114, 116 and 118 of Figure 1 and reference numeral 332 of Figure 3 are not mentioned in the Description. Applicants have amended the Specification herewith to include mention of these reference numerals.

### II. Objection to Specification

The Examiner objected to the Specification, stating that the serial number for the co-pending application needs to be provided. Applicants have amended the Specification herewith to provide such serial number.

### III. 35 U.S.C. § 112, Second Paragraph

The Examiner rejected Claim 4-6 and 14 under 35 U.S.C. § 112, second paragraph, as not providing proper antecedent basis for "the second electronic document". This rejection is respectfully traversed.

Applicants have amended Claims 4-6 and 14 to recite 'the image document' in lieu of 'the second electronic document', and since 'image document' has previously been recited in Claims 1 and 12, proper antecedent basis exists for the term "the image document" in Claims 4-6 and 14.

Therefore the rejection of Claim 4-6 and 14 under 35 U.S.C. § 112, second paragraph has been overcome.

IV. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over Wynblatt in view of Nielson. This rejection is respectfully traversed.

With respect to Claim 1, such claim recites two documents – an electronic document and an image document. The electronic document contains an image area, the image area having an associated hypertext link to the image document that has content for the image area. A header element for the image document is retrieved, and information contained within the header element is rendered non-visually. In contrast, the teachings of the cited Wynblatt system teach a two-step process for rendering a structured document such as HTML. First, the pre-rendering system converts the HTML document into an intermediate document. Then, an audio rendering system generates audio output from the intermediate document (Col. 2, lines 59-65). There is no indication that Wynblatt's two documents (HTML and intermediate) correspond to the claimed electronic document and image document. While the claimed electronic document and Wynblatt's HTML document may possibly be the same, that is where the similarity ends. The entire HTLM document is converted to an intermediate document, per the teachings of Wynblatt (Col 2, line 66 – Col. 4, line 3; Col. 4, lines 15-51). This intermediate document is then parsed for presentation to a user (Col. 4, lines 52-60). There is no indication that any fields, such as a header element, are retrieved for this intermediate document and information contained within such retrieved field is rendered non-visually. In contrast, per Claim 1, the claimed electronic document contains an image area, where the image area is associated with a hypertext link to an image document having content for the image. It is the header element for this image document that is retrieved. In summary, Wynblatt does not teach or suggest retrieval of header information for an image document, as claimed. Rather, Wynblatt teaches that the entire HTML document is converted to the intermediate document, which is then rendered to generate an audio output (Col. 2, lines 33-37). This intermediate document contains commands used in text-to-speech conversion (Col. 3, lines 56-65). These commands do not invoke or otherwise cause any type of retrieval of a header element for the image document, as expressly recited in Claim1.

In rejecting Claim 1, the Examiner cites Wynblatt col. 3, lines 37-63 and col. 5, lines 23-26 and 37-40 as teaching the claimed 'retrieving' step. Applicants show that Claim 1 recites 'retrieving a header element *for the image document*' (emphasis added), the image document being defined as the document having content for the image area (being rendered) contained within the electronic document. The cited Wynblatt teachings are reproduced below:

> Only content segments are analyzed for section information. Each content segment is considered a top-level section. *Within content sections any occurrence of a header tag or a fontsize tag is noted*. In HTML, header tags are valued from 1 to 6 in decreasing order of prominence, while fontsize can range from 1 to 7 in increasing order of size. In the sectioning process, fontsize tags larger than the default text size are treated as header tags with prominence equal to 8 minus their size value. Relative fontsize tags, such as <fontsize+2>, are first converted to absolute sizes by applying them to the default text size value. Fontsize tags defining sizes smaller than the default size are ignored.
>
> The result is a hierarchy of header tags of varying prominence. Sections are then defined hierarchically, using the header tags as boundaries, with the top-level sections forming the top of the hierarchy, and the header tags denoting the subsections, sub-subsections, and as many further gradations as are necessary to account for the number of prominence values present in the document.
>
> The output of Document Sectioning 24 flows to Computation of Speech Mark-up Information 26. This final step of the analysis is to create an intermediate document which can be interpreted by a text-to-speech engine. Fundamentally, this step produces the meta-information, in the form of commands, which will cause the text-to-speech engines to vary its voice, tone, rate and other parameters to adequately convey the information within the HTML document (col. 3, lines 37-63) (emphasis added by Applicants).
>
> In header mode, only headers are played. Headers can either be from header tags, or from fontsize tags, as described above. All modes begin a document by speaking the title of the document (col. 5, lines 23-26).
>
> In header mode the scan-forward control causes the playback to skip to the next header, and the scan-reverse control causes the playback to skip to the previous header (col. 5, lines 37-40).

As can be seen, while this passage makes mention of a 'header mode', there is no teaching or suggestion of retrieving a *header element for an image document*, the image

document being defined as the document having content for the image area (being rendered) *contained within the electronic document*. Rather, these passages merely describe a header mode, where a header tag is noted (Col. 3, lines 39-40) and played (Col. 5, lines 23-26). Of particular noteworthiness, as described above, is that this header tag is not for an image document having content for an image area contained within an electronic document, as claimed.

Nor does the cited Nielson reference overcome such deficiency. In rejecting Claim 1, the Examiner states that Nielson teaches a method for detecting and presenting client side image map attributes, including rendering a requested electronic document containing an image area and receiving a selection of the image area. The Examiner has not alleged, nor does the cited Nielson reference in fact teach, a method for rendering an image area, associated with a hypertext link to an image document having content for the image area, contained within an electronic document, comprising retrieving a header element for the image document. While Nielson may teach a link to an image document (Nielson Col. 8, line 13), there is no teaching or other suggestion in Nielson of retrieving a header element for this image document. Thus, it is shown that the teachings of Nielson do not overcome the teaching deficiency shown above with respect to the cited Wynblatt reference.

As the Examiner has failed to establish that either of the cited references teach or suggest the claimed document hierarchy (an electronic document and an image document, where the electronic document contains an image area, and the image area is associated with a hypertext link to an image document having content for the image) with associated retrieval of a header element for such image document – which is different from the electronic document – a prima facie case of obviousness has not been made with respect to Claim 1[1]. Therefore, Claim 1 is shown to not be obvious in view of the cited references.

[1] In rejecting claims under 35 U.S.C. Section 103, the examiner bears the initial burden of presenting a prima facie case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974).

Applicants traverse the rejection of Claims 2-6 for reasons given above with respect to Claim 1 (of which Claims 2-6 depend upon).

With respect to Claim 7, none of the cited references teach or suggest the claimed feature of "receiving a rendering of information contained within a header element of a second electronic document, wherein the second electronic document is referenced by said hypertext link". As can be seen, this step recites a header element of a second electronic document, where the second electronic document is referenced by a hypertext link associated with an image area within a first electronic document (i.e. the second electronic document is a document in addition to the first electronic document), and rendering of information contained within this header element. In rejecting Claim 7, the Examiner alleges that such step is taught by Wynblatt at col. 3, lines 37-63 and col. 5, lines 23-51. For similar reasons to those described above with respect to Claim 1, the cited Wynblatt does not teach the claimed document hierarchy, including a first electronic document *and* a second electronic document, where the second electronic document (as expressly recited in the claimed 'receiving' step that is alleged to be taught by Wynblatt) is referenced by a hypertext link that is associated with an image area within a first electronic document. Therefore, since Wynblatt does not teach such a second electronic document, it similarly follows that Wynblatt cannot teach receiving a rendering of information contained within a header element of such (missing) second electronic document, as expressly recited in Claim 7. Therefore, the Examiner has failed to establish a prima facie case of obviousness with respect to Claim 7, and the burden has not shifted to Applicants to rebut the obviousness rejection[2].

With respect to Claim 8, Applicants traverse for similar reasons to those given above with respect to Claim 7, and show that none of the cited references teach or suggest the claimed step of "receiving non-visual rendering information *contained within the header element of the second electronic document*" (emphasis added by Applicants), the second electronic document being defined as having a hypertext to it, and such

[2] In rejecting claims under 35 U.S.C. Section 103, the examiner bears the initial burden of presenting a prima facie case of obviousness. *In re Oetiker*, 977 F.2d 1443, 1445, 24 USPQ2d 1443, 1444 (Fed. Cir. 1992). Only if that burden is met, does the burden of coming forward with evidence or argument shift to the applicant. Id.

hypertext link having an image area associated with it, the image area being a part of a first electronic document.

With respect to Claim 9, Applicants traverse for similar reasons to those given above with respect to Claim 1.

With respect to Claim 10 and 11, Applicants traverse for similar reasons to those given above with respect to Claims 7 and 8.

With respect to Claim 12 (and dependent Claims 13 and 14), Applicants traverse for similar reasons to those given above with respect to Claim 1.

With respect to Claim 15 (and dependent Claims 16-18), Applicants traverse for similar reasons to those given above with respect to Claim 8.

With respect to Claim 19, Applicants traverse for similar reasons to those given above with respect to Claim 7.

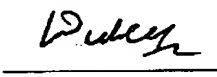
Therefore, the rejection of Claims 1-19 under 35 U.S.C. § 103 has been overcome.

## V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 10/29/04

Respectfully submitted,



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